



Memorandum

TO: HONORABLE MAYOR AND CITY COUNCIL

FROM: Jeffrey L. Clet
Carl W. Mosher

SUBJECT: ESD / WPCP EMERGENCY PLAN
AND DUPLICATE SERVICES

DATE: 6-1-05

Approved	/s/	Date	06/02/05
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RECOMMENDATION

The Fire Department and Environmental Services Department agree that opportunities exist to better partner on training, prevention and emergency response at the Plant. Specifically, staff from the Fire Department and the Environmental Services Department will continue efforts to explore opportunities to reduce duplication of services and improve efficiencies and effectiveness. These efforts will focus on the following areas:

- Consider having the Fire Department personnel serve as the primary instructor for self-contained breathing apparatus (SCBA) training, and explore the opportunity to have the Fire Department provide SCBA bottle refill and testing services.
- Consider having the Fire Department personnel provide all CPR and First Aid training for Plant staff.
- Contingent upon approval of the recommendation to restore the Fire Department's Hazardous Incident Team (HIT) (MBA#41), HIT personnel will serve as the primary instructor for Hazardous Materials First Responder Awareness Level training for Plant staff.

In addition, the Fire Department and ESD will continue to explore other opportunities for in-sourcing services.

PURPOSE

Respond to the Mayor's Budget Memo directing the City Manager to implement the emergency response plan developed by the Environmental Services Department, in partnership with the Fire Department and the Office of Emergency Services, and eliminate duplicated services provided by both Fire and Environmental Services staff.

BACKGROUND

The United States Environmental Protection Agency (USEPA)'s Clean Air Act Amendments of 1990 included provisions requiring facilities using certain substances to develop a plan to reduce the likelihood of an accidental release of the substances to the atmosphere that could cause serious harm to the public and the environment. The plan must also include mitigation measures to reduce the potential impact on the public in the unlikely event of a release. These requirements are detailed and codified in 40 CFR Part 68. A related program, the federal Occupational Safety and Health Administration (OSHA) Process Safety Management (PSM) program, codified in 29 CFR 1910.112 and Section 5184 of Title 8 of the California Code of Regulations, requires a release prevention and mitigation plan for highly hazardous materials.

Subsequently, EPA required that agencies handling certain quantities of various chemicals file a Risk Management Plan (RMP) by 1999. The Water Pollution Control Plant received certification of its five-year RMP in 1999 and again in 2004. These plans were coordinated with the City of San Jose Fire Department and the County Department of Environmental Health. The program includes an Emergency Response and Evacuation Plan specific to the chlorine and sulfur dioxide processes.

ANALYSIS

The Plant is staffed and operated 24 hours a day, every day of the year, with trained operations personnel. All Plant staff are trained at the First Responder Awareness Level as described in 8 CCR 5192(q)(6)(A). Select staff are trained at both the First Responder Operations Level as described in 8 CCR 5192(q)(6)(B) and the Hazardous Materials Technician Level as described in 8 CCR 5192(q)(6)(C).

Chlorine area operators at the Plant are highly trained as First Responders, since time is of the utmost essence, but the Hazardous Incident Team (HIT) and other Fire units currently provide valuable back-up resources. Emergency response drills and drill evaluations are conducted every 12 months. The HIT unit and other Fire Units participate in the annual exercise. HIT and Plant staff annually review emergency operation and response procedures.

Each Plant employee involved in operating or maintaining the chlorine and sulfur dioxide processes is trained in an overview of the process and the detailed, applicable operating and maintenance procedures. The Plant's training program helps employees understand the nature and cause of problems arising from operations involving chlorine and sulfur dioxide on site, and increases employees' awareness with respect to process hazards. The Plant training program includes both initial and refresher training that covers (1) a general overview of the processes, (2) the properties and hazards of chlorine and sulfur dioxide, and (3) a detailed review of process operating procedures and safe work practices. Demonstrations and field observations are used to verify that employees understand the training material.

Currently, the Red Cross provides training to all Plant employees on such topics as basic first aid and CPR. Outside contractors are used to provide training to appropriate personnel for process-specific topics (such as use of the self-contained breathing apparatus, tank car hook up procedures, and leak response), and for disinfection process area-specific basis (on-the-job, equipment or procedures/specific skills). Employees whose assigned duties include the

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operation and maintenance of the disinfection process area include the plant operators, senior plant operators, and plant shift supervisors. Verification that employees have understood the training is accomplished either by field observation, field demonstration, or written or oral testing.

The Plant has staff on-site and on call trained to the Hazardous Materials Technician Level that are authorized to respond to and attempt to repair chemical leaks. All employees receive Hazwoper training including annual refresher training. Employees also have received training in the incident command system. Employee training and refresher training records are maintained on-site and updated after training occurs. Training includes providing chlorine and sulfur dioxide hazards awareness, how to safely handle these gases, how to use safety and response equipment, what to do during an emergency response, and how to evacuate the site, when necessary. Medical examinations are provided for employees that are certified to wear respirators. Only respirator certified employees are allowed to don respirators and enter an area that may contain chlorine or sulfur dioxide above permissible exposure limits and attempt to isolate leaks.

COORDINATION

This memo has been coordinated with the Office of Emergency Services.

CONCLUSION

Plant staff has operated the chlorine and sodium dioxide processes for over 40 years without any significant incidents onsite due to a high level of training and caution. The current RMP certifies that during the past five years there have been no accidental releases that resulted in injuries, death or significant property damage either onsite or offsite from either of the regulated processes. ESD and the Fire Department are well aware of the potential need for evacuation or medical treatment needs that may result from a leak in either the chlorine or sodium dioxide processes and stand ready for an emergency event.

The two departments also agree, however, that cooperation and shared uses of resources could result in efficiencies and budget savings in the provisions of these critical services. As described in the recommended actions section of this memorandum, the departments will work together to consider a number of such potential cooperative actions over the next several months. The actions recommended to implement any appropriate program and corresponding budgetary actions would be presented during the 2005-2006 Mid-Year Budget Review process.

/s/
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/s/
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